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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Federal-State Joint Board on)	CC Docket No. 96-45
Universal Service)	
)	
Forward-Looking Mechanism for)	CC Docket No. 97-160
High Support for Non-Rural LECs)	DA 97-2329

COMMENTS OF AMERITECH

Ameritech¹ submits these comments in response to petitions of NARUC and certain state public service commissions requesting that the Commission grant an extension of time from the current deadline of February 6, 1998, for states, who have already elected to perform their own cost studies, to file those studies with the Commission. Of the petitioners listed in the Public Notice (DA 97-2329), three requested a three-month extension,² one a four-month extension,³ and one an extension until September 1, 1998 (approximately seven months).⁴ In addition, Ameritech is aware of requests by both the New Mexico State Corporation

¹ Ameritech means: Illinois Bell Telephone Company, Indiana Bell Telephone Company, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company, and Wisconsin Bell, Inc.

² Nebraska Public Service Commission, Public Service Commission of Nevada, and the Maine Public Utilities Commission.

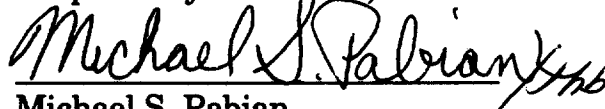
³ Tennessee Regulatory Authority.

⁴ NARUC.

Commission and the Minnesota Public Utilities Commission for a four month extension as well.

Ameritech agrees with petitioners' representation that the issues involved in developing an appropriate cost study are complex and time consuming. For that reason, Ameritech would not object to an extension of three to six months in the time required for states who have already elected to perform their own cost studies to submit those studies to the Commission. Such an extension would permit state authorities sufficient time to develop more accurate and complete studies that will be critical in computing federal high cost support.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael S. Pabian", with a stylized flourish at the end.

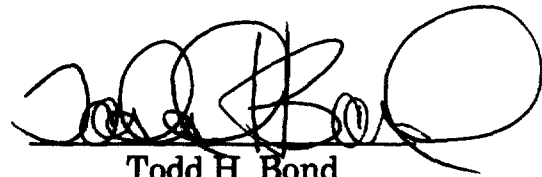
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Dated: November 19, 1997
[MSP0083.doc]

CERTIFICATE OF SERVICE

I, Todd H. Bond, do hereby certify that a copy of the foregoing Comments of Ameritech has been served on all parties listed on the attached service list, via first class mail, postage prepaid, on this 19th day of November, 1997.

By:

A handwritten signature in black ink, appearing to read 'Todd H. Bond', written over a horizontal line.

Todd H. Bond

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